

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
SPRINGFIELD DIVISION

DAVID STEBBINS )  
Plaintiff )  
 )  
v. )  
 ) Civ. No. 10-3305-CV-S-RED  
RANDAL RICHARDSON )  
And )  
 )  
RELIABLE HEAT & AIR, LLC )  
Defendants )

**MOTION TO IMPOSE SANCTIONS**

Comes now Plaintiff David Stebbins, who respectfully moves for sanctions, appropriate with the filing of a frivolous defense.

Defendants' lawyer, Gary W. Allman, when filing his answer to my complaint raised the defense that I had failed to state a claim upon which relief can be granted. This is simply untrue, and he knew it was.

He proceeded to list denials of my claims that were directly related to my claims. Therefore, he read the complaint, so he knew that I was suing over a hostile work environment, wrongful termination, and infliction of emotional distress. Any lawyer who is even remotely competent would know that those are claims upon which relief can be granted.

Any reasonable lawyer would know that such a defense is phooey. Any reasonable lawyer would know that I have certainly stated a claim upon which relief can be granted.

Wherefore, I respectfully pray that you dismiss the defendants' absolute defense with the utmost prejudice, and impose sanctions appropriate for the filing of a frivolous defense.

Sincerely,  
David Stebbins

